

EXHIBIT B

From: Catherine Smith
To: Marie M. Jones; Alyssa DeBise; Maria N. Pipak; Michael R. Lettrich; Lisa Yeasted; ggeiger@newmanwilliams.com; Nikole Threats; Lees, Paul; kbambary@dmclaw.com; mwynkoop@margolisedelstein.com; Mendez, Jocelyn; abaranowski@margolisedelstein.com; Miller, Michael; Tara Panella-Eichler
Subject: Re: Jane Doe, et al. v. Schuylkill County et. al. (Civil Action No.: 3:21-00477)
Date: Thursday, July 6, 2023 8:56:54 AM
Attachments: image003.png
image004.png
image005.png

Counsel,

As you know, this report did not exist until more recently and as such, it could not be obtained prior to the discovery deadline. Post deadline discovery is permissible under such circumstances. Additionally, the contents of this report, as I understand, include relevant information related to my clients' claims. As it is your objection, please prepare a letter to His Honor requesting a teleconference conference for my review.

Please let me know if you have any questions or concerns.

Thank you,

Catherine W. Lowry, Esq.

*Admitted PA & NJ.

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From: Marie M. Jones <mjones@jonespassodelis.com>

Sent: Wednesday, July 5, 2023 2:54 PM

To: Alyssa DeBise <alyssa@dereksmithlaw.com>; Catherine Smith <catherine@dereksmithlaw.com>; Maria N. Pipak <mpipak@jonespassodelis.com>; Michael R. Lettrich <mlettrich@jonespassodelis.com>; Lisa Yeasted <lyeasted@jonespassodelis.com>; ggeiger@newmanwilliams.com <ggeiger@newmanwilliams.com>; Nikole Threats <nthreats@newmanwilliams.com>; Lees, Paul <plees@dmclaw.com>; kbambary@dmclaw.com <kbambary@dmclaw.com>; mwynkoop@margolisedelstein.com <mwynkoop@margolisedelstein.com>; Mendez, Jocelyn <jmendez@margolisedelstein.com>; abaranowski@margolisedelstein.com <abaranowski@margolisedelstein.com>; Miller, Michael <mmiller@margolisedelstein.com>; Tara Panella-Eichler <tpanella@jonespassodelis.com>

Subject: RE: Jane Doe, et al. v. Schuylkill County et. al. (Civil Action No.: 3:21-00477)

Catherine and Alyssa,

While I thought I had addressed this issue, it appears my email may not have been sent.

The county objects to this request and believes this request is improper.

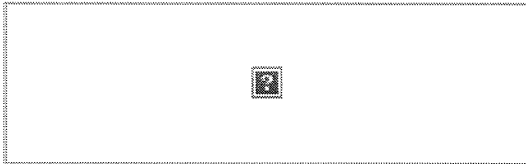
First, while the subpoena is directed to Denise Elliott, it appears the information sought from her relates to her role as an attorney retained to perform work as an EEO Officer for the county. The information therefore, is information that is really that of the county's. This request is nothing more a request for information of the county and styling it as a subpoena to Ms. Elliott is a back door method of doing discovery which should not be permitted.

Moreover, discovery is now long concluded.

In addition, Ms. Twigg is not party to the suit, so seeking discovery about her is not related to the issues in the case nor proportional to the needs of the case, particularly at this stage of the litigation, but instead amounts to a fishing expedition.

We can fashion a letter to the court if needed to further address this, as was done in the past on issues connected to subpoenas to which a party objected.

Best,
Marie



Marie Millie Jones

Attorney at Law

Martindale-Hubbell® AV Peer Review Rated Preeminent™

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From: Alyssa DeBise <alyssa@dereksmithlaw.com>

Sent: Wednesday, June 21, 2023 2:24 PM

To: Marie M. Jones <mjones@jonespassodelis.com>; Maria N. Pipak <mpipak@jonespassodelis.com>; Michael R. Lettrich <mlettrich@jonespassodelis.com>; Lisa Yeasted <lyeasted@jonespassodelis.com>; ggeiger@newmanwilliams.com; Nikole Threats <nthreats@newmanwilliams.com>; Lees, Paul <plees@dmclaw.com>; kbambary@dmclaw.com; mwynkoop@margolisedelstein.com; Mendez, Jocelyn <jmendez@margolisedelstein.com>; abaranowski@margolisedelstein.com; Miller, Michael <mmiller@margolisedelstein.com>

Cc: Catherine Smith <catherine@dereksmithlaw.com>

Subject: Jane Doe, et al. v. Schuylkill County et. al. (Civil Action No.: 3:21-00477)

Good afternoon, Counsel,

Please see the attached Notice of Intent to Serve a Subpoena upon Denise Elliot, Esquire, as well as the corresponding subpoena.

Please let me know if you have any questions and concerns.

Thank you,

Alyssa DeBise

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